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November 20, 2012

**VIA ELECTRONIC DELIVERY**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street, SW  
Room TWA325  
Washington, DC 20554

**Re: Notice of *Ex Parte* Presentation  
WT Docket No. 12-69**

Dear Ms. Dortch:

On November 16, 2012, Scott Wills, Paul Kolodzy, and Michele Farquhar, representing Vulcan Wireless LLC (“Vulcan”), met with Courtney Reinhard, Legal Advisor to Commissioner Ajit Pai.

During the meeting, the parties discussed the fundamental technical issue presented by the Commission in the NPRM: specifically, whether consumers would experience harmful interference if the Commission were to require 700 MHz B and C Block licensees to grant their customers the freedom to roam and interoperate with license holders in the 700 MHz A Block.<sup>1</sup> As reflected in the attached slides, the overwhelming weight of the record evidence (and all of the field studies conducted) indicate that an interoperability requirement – and all of the attendant consumer benefits that it will generate – will *not* cause harmful interference to 700 MHz B and C Block licensees.

In addition, the Vulcan representatives explained that implementing interoperability across the Lower 700 MHz band would impose no additional costs on licensees, handset manufacturers, or consumers of any consequence. Licensees can restore interoperability on installed equipment in the Lower 700 MHz band through a routine software update. Neither deployed base stations nor existing user equipment would require any hardware changes. For devices sold to consumers after the effective date of the order, the only physical element to change would be the incorporation of a new filter component to replace the existing one. Following the effective date of an Order in this proceeding, the new filter component would become common to all new devices in the Lower 700 MHz A, B, and C Blocks. Since it would be used in all devices, the new filter will not result in any cost increases and may result in cost reductions due to economies of scale across the larger base of deployed devices. No other hardware changes are required to any components. The result of this process would be the restoration of interoperability in the Lower 700 MHz band and an end to the use of two separate band specifications that currently bifurcate operations across the three paired channels in the Lower 700 MHz band. These considerations are set forth in the attached slides that were presented during the meeting.

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<sup>1</sup> Promoting Interoperability in the 700 MHz Commercial Spectrum, *Notice of Proposed Rulemaking*, WT Docket No. 12-69, FCC 12-31 ¶ 5 (rel. Mar. 21, 2012).

The representatives also discussed market developments that make acting now to restore interoperability imperative. Without prompt action, A Block licensees who currently use Band Class 12 to deploy their networks will fall further and further behind in both the developmental ecosystem for new features and functions, such as Voice over LTE, and in the global supply chain for incorporation and use in the latest and most advanced handsets and consumer devices. Timely and geographically expansive broadband deployment in the United States would suffer as a result and so would consumers.

Pursuant to Section 1.1206(b) of the Commission's rules, I am filing this notice electronically in the above-referenced docket. Please contact me directly with any questions.

Respectfully submitted,

*/s/ Michele C. Farquhar*

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cc: Courtney Reinhard